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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

‘ĪLIO‘ULAOKALANI COALITION, a)	Civil No. 04-00502 DAE BMK
Hawai'i nonprofit corporation; NĀ ‘IMI)	
PONO, a Hawai'i unincorporated)	PLAINTIFFS' MOTION FOR LEAVE
association; and KĪPUKA, a Hawai'i)	TO FILE DECLARATION OF
unincorporated association,)	KAMOA QUITEVIS; CERTIFICATE
)	OF SERVICE
Plaintiffs,)	
)	
v.)	<u>Hearing:</u>
)	
DONALD H. RUMSFELD, Secretary of)	Date: November 20, 2006
Defense; and FRANCIS J. HARVEY,)	Time: 9:45 a.m.
Secretary of the United States)	Judge: Hon. David A. Ezra
Department of the Army,)	
)	
Defendants.)	
)	

PLAINTIFFS' MOTION FOR LEAVE TO
FILE DECLARATION OF KAMOA QUITEVIS

Plaintiffs ‘Īlio‘ulaokalani Coalition, Nā ‘Imi Pono, and Kīpuka respectfully
seek leave to file the Declaration of Kamoa Quitevis, lodged herewith, which

responds to some of the more egregious misstatements in the Declaration of Laurie Lucking, which defendants Donald H. Rumsfeld, Secretary of Defense, and Francis. J. Harvey, Secretary of the United States Department of the Army, submitted with their Memorandum On The Scope Of Interim Injunctive Relief. Consideration of this declaration will assist the Court in conducting the fact-intensive inquiry regarding the irreparable cultural harm associated with defendants' proposed Stryker activities, as required by the Ninth Circuit's October 27, 2006 order.

DATED: Honolulu, Hawai'i, November 17, 2006.

EARTHJUSTICE
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By: /s/ David L. Henkin
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